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Attorney for Plaintiff

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON**

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WENDY FARRIS,

Plaintiff,

vs.

LOREN CULP, REPUBLIC POLICE  
DEPARTMENT, CHRISTINE CLARK, and  
FERRY COUNTY SHERIFF,

Defendants.

**MOTION FOR LEAVE TO  
WITHDRAW**

Case No: 2:20-cv-00290-SMJ

Judge: SALVADOR MENDOZA,  
JR.

COMES NOW, Eric Fong, attorney for Plaintiff Wendy Farris in this matter, and respectfully requests leave to withdraw as counsel for Plaintiff.

The undersigned has given notice to the client of his intention to withdraw prior to submitting this request to the Court. The undersigned certifies that he has advised the Plaintiff that the U.S. District Court retains jurisdiction of this matter, that the Plaintiff has deadlines in this case that must be met, and that the Plaintiff would thus have the obligation to prepare to go forward with their case pro se or to hire other counsel to handle their case.

In support of this motion, Eric Fong states as follows:

1. I was retained in this case on July 31, 2020. At that time, I understood that the statute of limitations was going to expire soon. While I did not have the luxury of having represented Ms. Farris for years or even months, she had enough materials for me to review, and at the time I believed she had a viable cause of action. Ms. Farris desperately needed help preparing a complaint and submit a federal tort claim, so I agreed to represent her.
2. I appeared on behalf of the plaintiff on August 18, 2020, by filing the original Complaint in this matter, the day the statute of limitations expired.
3. In the meantime, I have consulted with experts in the field, a practice I would normally engage in before taking on a case such as this.
4. Based on my investigation, Ms. Farris and I have a fundamental difference of opinion on how to move forward. As such the attorney client relationship is irrevocably broken.
5. The plaintiff wishes to proceed in this matter, and should be able to do so with an attorney of her choosing, or pro se.
6. I respectfully request the Court to grant my motion to withdraw as I cannot adequately represent her.
7. I have provided all future court deadlines to the plaintiff.

Wherefor, the undersigned Eric Fong respectfully request that an Order be entered permitting him to withdraw as attorney of record for Wendy Farris.

DATED this 7<sup>th</sup> day of May 2021.

FONG LAW

/s/ Eric Fong  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on this 7th day of May, 2021. I caused a true and correct copy of this MOTION FOR LEAVE TO WITHDRAW to be emailed to all counsel of record as following:

**Counsel for Culp and City of Republic**

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**Wendy Farris**

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/s/ Emma Aubrey  
Emma Aubrey